China indirect tax - efficient sourcing



Current position

Global businesses are increasing their sourcing from China to meet with their business needs.

Sourcing models vary from direct sourcing to consolidation centre.

Price/quality/quantity of the products delivered may be different from the original order.

Businesses may need to provide the Chinese partner with tooling and machinery.

Chinese partner may provide warranty on its products.

Defective parts may need to be imported, repaired and exported.

The above activities would lead to Chinese indirect tax implications, sometimes the implications could be simple but sometimes not.



What to do/ potential benefits

What to do:

China indirect tax efficiency sourcing review is aiming to release the potential indirect tax benefits from the sourcing operation.

Potential benefits:

Assess the current level of indirect tax efficiency by having a better gauge of the indirect tax cost of the current operation.

Discover potential areas where indirect tax efficiency can be improved.

Discover potential areas of saving.



How to proceed

The 3-phase approach:

 Understand the current sourcing model/ operation

To gain understanding of the transaction and materials flows with respect to the current sourcing model/operation.

2. Indirect tax efficiency assessment

Review and analyse the PRC indirect tax implications of the current sourcing model/ operation – qualitative and/or quantitative analysis.

3. Indirect tax efficiency enhancement solutions identification

Identifying any indirect tax efficient arrangements which may be applicable to the sourcing activities. The cost-benefit factors of these solutions would also be considered.



Businesses with significant sourcing from China. In particular, for businesses who wish to:

- Mitigate their irrecoverable VAT cost due to export
- Check whether changes to the orders made (e.g., quantity, price and quality) would lead to adverse indirect tax implications
- Mitigate the indirect tax cost incurred on arrangements relating to provision of tooling and equipments

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